

REMARKS

Reconsideration and allowance are respectfully requested. Claims 1-4 are currently pending. Claims 1-3 were rejected. Claims 2 has been amended, and new dependent Claim 4 has been submitted. No new matter has been entered. Based on the following remarks, it is believed that all pending claims are in condition for allowance and a notice to that affect is respectfully requested.

I. Objection to Claim 2

Claim 2 was objected to because of a typographical error in the phrase "section which determined". In response, Claim 2 has been amended to correct the typographical error, and now calls for a "section which determines".

II. §103(a) Rejection based on Beard and AAPA

Claims 1-3 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,067,577 to Beard in view of Applicant's admitted prior art (AAPA). Based on the following remarks, Applicant respectfully traverses this rejection.

Independent Claim 1 calls for a computer system that, among other things, includes:

a library between the application program and the operating system, the library including a plurality of components responsive to function calls from the application program, and

wherein the library comprises components defined by a native library associated with the operating system and other components defined by a special portability library  
associated with the application

(emphasis added).

In contrast to the claimed invention, the reference of Beard discloses a more traditional computer system in which

different computer programs communicate with and utilize the native library of that computer (i.e., the library associated with that specific operating system and specific computer hardware). No where does Beard disclose the use of a special portability library.

Additionally, the system disclosed in Beard is developed around and requires the use of a dynamic form of binding (converting symbolic addresses in a program to storage-related addresses). In contrast, Applicant's computer system has no such requirement, thus providing it with a performance advantage.

The Office Action acknowledges that Beard is silent with reference to components defined by a special portability library associated with an application. However, the Office Action then asserts that it would have been obvious to combine the teaching of Beard with Applicant's acknowledged prior art (specifically, the prior art reference disclosed on pages 2-3 of the application and illustrated in Figure 2), and that such a combination would disclose the claimed invention. However, as will be discussed below, such a combination would simply result in a computer system that contained two complete and redundant libraries, including a library associated with the program application, and a library associated with the operating system.

Applicant's acknowledged prior art (AAPA) specifically cited by the Office Action discloses a computer system designed for use with a so-called feature-sparse platform, namely one in which features such as font rendering, window management, etc., are not present. Accordingly, the AAPA reference is seen to comprise a system that includes an application-provided portability library. For an application program to function, it must communicate and draw information from this portability library that it provides, as opposed to

other systems, such as Beard, which utilize a native library associated with the operating system.

In contrast to the claimed invention, a theoretical combination of Beard and AAPA would result in a system that possessed two complete libraries, including a (portability) library associated with an application, and a (native) library associated with the operating system. Furthermore, the output of the library associated with the application would lead directly into the library associated with the operating system. Additionally, each library would comprise all components. This would result in a highly redundant and inefficient system that wastefully requires additional resources than necessary.

The claimed invention, on the other hand, calls for a system having a library comprising "components defined by a native library associated with the operating system and other components defined by a special portability library associated with the application." Neither Beard nor AAPA suggest, let alone disclose, using a library comprised of components defined by two sources. Consequently, both references suffer the disadvantage that adapting a program application to a new target platform becomes an involved and time-consuming process. The claimed invention solves this problem by providing a library comprising components defined by two sources.

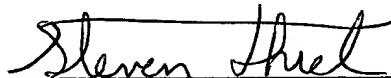
For the above reasons, Applicant believes that claims 1-3 are allowable over Beard and AAPA, taken either individually or in combination.

### III. New Claim 4

New dependent Claim 4 adds the feature of a "portability layer which directs the calls to components of the native library, if such components exist, or otherwise directs the calls to components of the special portability library". Such

an arrangement further enhances the invention of Claim 1 by providing a particularly efficient way of directing calls to the particular library where a component exists. Based on the reasons stated above with respect to Claims 1-3, Applicant believes that Claim 4 is also allowable over Beard and AAPA.

Respectfully submitted,

  
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